



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 23, 2011

Sarah Malaby
Fremont-Winema National Forests
2819 Dahlia Street
Klamath Falls, Oregon 97601

Re: U.S. Environmental Protection Agency (EPA) review and comments on the Fremont-Winema National Forests (Forests) Invasive Plant Treatment Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).
EPA Region 10 Project Number: 07-009-AFS.

Dear Ms. Malaby:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

In our December 28, 2009 comment letter on the Draft EIS (DEIS) we stated our support for the selection of Alternative 2. Frederick L. Way, Forest Supervisor, has selected Alternative 2. We support this decision and agree with the ROD's conclusion that Alternative 2, "...would most effectively reduce the presence and influence of invasive plants on National Forest System lands."

We understand that Alternative 2's effectiveness is based on a relatively more aggressive utilization of herbicides – compared to Alternative 3. Also, we believed, and continue to agree with the Forests' conclusion, that Project Design Criteria (PDC), "...minimize the risk that herbicide exposures would exceed thresholds of concern for people, wildlife, and fish." (FEIS, 3.3-28).

To encourage a fuller disclosure of the Forests' substantial work and understanding of the importance of the planning phase for invasive plant treatments – especially when the utilization of herbicides is involved – we recommended the FEIS include additional information on the decision process used to assign treatment objectives, methods and restoration strategies. Implementation planning information in FEIS Appendix E is fully responsive to our recommendation.

We also recommended that the FEIS include additional information to address our concern that the DEIS did not sufficiently disclose implementation monitoring elements which would measure, for example, the degree to which Project Work Plans were carried out as proposed. Information in Appendix E generally, and, specifically in Table E.3's two new columns, "How to Implement" and "How to Monitor", is fully responsive to our recommendation.



Our effectiveness monitoring and adaptive management recommendation is also accounted for in Appendix E. Appendix E clearly describes the process and mechanisms through which project work plans and restoration strategies will take monitoring results into account.

In summary, we support your selection of Alternative 2 and believe, especially with the addition of Appendix E, that the FEIS discloses a well thought out monitoring program.

Thank you for this opportunity to comment and if you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov , or contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov .

Sincerely,.



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit